



November 6, 2020

VIA ECF and FAX

Hon. Judge Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Plaintiffs' Joint Motion for Appointment of Gayle Blatt and Jean Martin as Interim Co-Lead Counsel and the Appointment of an Executive Committee (ECF No. 26)
Combs, et al. v. Warner Music Group, No. 1:20-cv-07473-PGG
Kuhn, et al. v. Warner Music Group, No. 1:20-cv-07608-PGG

Hon. Judge Gardephe:

On October 16, 2020, we filed the above referenced Plaintiffs' Joint Motion for Appointment of Gayle Blatt and Jean Martin as Interim Co-Lead Counsel and the Appointment of an Executive Committee (the "Motion") in the matters identified therein (ECF No. 26). At that time, we were aware of five lawsuits having been filed, and had been working with all counsel to self-organize and reach agreement on the proposed leadership structure.

The Motion was filed with the support of all known cases on file at the time in this Court. Those cases are:

Combs, et al. v. Warner Music Group, No. 1:20-cv-07473-PGG, filed 9/11/20;
Kuhn, et al. v. Warner Music Group, No. 1:20-cv-07608-PGG, filed 9/16/20;
Beardsley, et al. v. Warner Music Group, No. 1:20-cv-07967-PGG, filed 9/25/20;
Cimaglio v. Warner Music Group, No. 1:20-cv-08085-PGG, filed 9/30/20; and
Guitierrez, et al. v. Warner Music Group, No. 1:20-cv-08117-PGG, filed 9/30/20.

Subsequently, we became aware of four additional case filings based on the same set of facts against the same defendant. These include:

Watts v. Warner Music Group, Corp. Case No. 1:20-cv-08644- PGG, filed 10/16/20;
Hart v. Warner Music Group, Corp. Case No. 1:20-cv-08952-PGG, filed 10/26/20;
Buck v. Warner Music Group Corp. Case No. 1:20-cv-09075-PGG, filed 10/29/20; and
Hammett v. Warner Music Group Corp. Case No. 1:20-cv-09261-PGG, filed 11/04/20.

To date, we have obtained the consent of counsel for *Hart* and *Hammett* to the leadership structure proposed in the Motion. However, counsel for *Watts* and *Buck* do not consent to the proposed structure. Thus, the Motion is now not unopposed or joint as to all Plaintiffs' counsel, as it was when it was filed.

We request the Court's guidance as to how to proceed, as this new development may cause the need for revision of the previously proposed deadlines for the filing of a consolidated complaint and proposed agreed upon briefing schedule (ECF No. 28).

Respectfully Submitted,

/s/ Jean S. Martin

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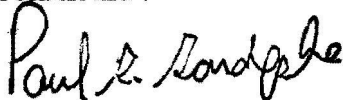
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cc: Via ECF All Counsel of Record in the Related Actions

MEMO ENDORSED

The following briefing schedule will apply to Plaintiffs' motions to appoint interim lead counsel: Any further motions are due by **November 23, 2020**; Opposition papers are due by **December 7, 2020**; Any reply is due by **December 14, 2020**. The deadline for Plaintiffs to file a Consolidated Amended Complaint and for Defendant to respond is stayed until resolution of the motion to appoint interim lead counsel.

SO ORDERED.



Paul G. Gardephe
United States District Judge

November 10, 2020